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**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

JOHN DOE I et al. on behalf of themselves  
and all others similarly situated,

GOOGLE LLC,

Case No. 3:23-cv-02431-VC  
(Consol. w/ 3:32-cv-02343-VC)

**DECLARATION OF CHRISTIAN  
LEVIS IN SUPPORT OF  
STIPULATION RE: MOTION TO  
DISMISS HEARING DATE**

District Judge Vince Chhabria

I, Christian Levis, declare:

1. I am an attorney in good standing admitted *pro hac vice* before the Court for this action. I am a partner at Lowey Dannenberg, P.C., and represent Plaintiffs in *Doe et al v. Google LLC*, No. 3:23-cv-02431-VC (N.D. Cal.).

2. I have personal knowledge of the facts contained herein and if called as a witness would and could testify competently thereto.

3. I submit this declaration in support of Plaintiffs' and Google LLC's Stipulation Re: Motion to Dismiss Hearing Date.

4. Plaintiffs filed their Consolidated Class Action Complaint on July 13, 2023 (Dkt. 41).

5. On August 3, 2023, Google filed its combined Opposition to Plaintiffs' Motion for Preliminary Injunction and Motion to Dismiss (Dkt. 48). The Court heard argument on Plaintiffs' Motion for Preliminary Injunction on September 21, 2023 (Dkt. 72).

6. Plaintiffs filed an Administrative Motion for Leave to Amend Complaint and to Set Schedule on October 20, 2023 (Dkt. 81).

7. The Parties entered a stipulation on October 20, 2023, agreeing: (1) Plaintiffs shall file their First Amended Consolidated Class Action Complaint ("FAC") on or before November 16, 2023; (2) Google shall file any Motion to Dismiss the FAC by December 21, 2023; (3) Plaintiffs shall file any opposition to Google's Motion to Dismiss by January 25, 2024; (4) Google shall file any reply in support of its Motion to Dismiss by February 8, 2024; and (5) the hearing on Google's Motion to Dismiss shall be set for February 22, 2024 (Dkt 81-1).

8. The Court granted Plaintiffs' request for leave to file the FAC and the Parties' proposed schedule on October 24, 2023 (Dkt. 82).

9. Plaintiffs filed their FAC on November 16, 2023 (Dkt. 86).

10. Google filed its Motion to Dismiss the FAC (Dkt. 88) and Request for Judicial Notice on December 21, 2023 (Dkt. 89).

11. The Parties entered a stipulation on January 18, 2024 that explained a scheduling conflict was the basis for the Parties' request to continue the previously-stipulated hearing date to February 29, 2024 at 1:00 PM via Zoom, but failed to specify that the nature of the conflict was as follows: counsel who intend to argue for Google developed a scheduling conflict for the previously stipulated hearing date of February 22, 2024, and counsel who intend to argue for Plaintiffs are unavailable in person on February 29, 2024, but could be available via Zoom (Dkt. 92).

12. In granting the Parties' January 18, 2024 Stipulation as modified, the Court (1) set the hearing on Google's Motion to Dismiss the FAC for February 29, 2024 at 10:00AM in Courtroom 4, 17th floor at 450 Golden Gate Avenue, San Francisco, CA 94102, and (2) set the next case management conference for March 22, 2024 at 10:00 AM via Zoom (Dkt. 95).

13. The Parties conferred and determined that March 14, 2024 at 10:00AM is the earliest date available after February 22, 2024 for an in-person civil motion hearing that counsel for the Parties intending to argue can be present in person at the Court, and thus agree that the hearing on Google's Motion to Dismiss the FAC should be set for March 14, 2024 at 10:00AM in Courtroom 4, or as soon thereafter as is convenient for the Court.

14. There have been six prior time modifications in this case.

15. The Initial Case Management Conference set for August 16, 2023 and corresponding Case Management Statement due by August 9, 2023 (Dkt. 5) was rescheduled to September 21, 2023 and September 14, 2023, respectively, by Clerk's Notice (Dkt. 15).

16. Upon reassignment, the Initial Case Management Conference was rescheduled to August 25, 2023, and the corresponding Case Management Statement was then due by August 18, 2023 (Dkt. 30).

17. The Court rescheduled the Initial Case Management Conference to June 30, 2023, and ordered the Joint Case Management Statement due by June 23, 2023 (Dkt. 31).

18. The Court entered the Parties' Stipulation to extend the briefing schedule for Google's Motion to Disqualify Plaintiffs' Expert extending the deadline for Plaintiffs to file their opposition brief from August 17, 2023 to August 24, 2023 and the deadline for Google to file its reply brief from August 24, 2023 to September 7, 2023 (Dkt. 57).

19. The Court entered the Parties' Stipulation to extend the time for Plaintiffs to oppose Google's Request for Judicial Notice to January 25, 2024, and Google's time to file any reply in support of its Request for Judicial Notice to February 8, 2024 (Dkt. 91).

20. The Court entered the Parties' Stipulation to move the hearing on Google's Motion to Dismiss the FAC, as modified by the Court, to February 29, 2024 at 10:00 AM in Courtroom 4, 17th floor, as well set the Parties' next Case Management Conference to March 22, 2024 at 10:00 AM via Zoom (Dkt. 95).

21. The proposed stipulation will not alter the date of any event or deadline set by Court order, except the Motion to Dismiss hearing.

I declare under penalty of perjury that the foregoing is true and correct, and that this declaration was executed on January 30, 2024, in White Plains, NY.

Dated: January 30, 2024

By: /s/ Christian Levis  
Christian Levis